

State of Indiana
Strategic Plan for Title I of the Workforce Investment Act of 1998
and the Wagner-Peyser Act

Summary of Public Comment Process

Process

A notification announcing the availability of Indiana's Strategic Plan for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act – Modification 3 for public comment was issued to –

- ▶ State Board
- ▶ Local Workforce Investment Boards
- ▶ Regional Boards
- ▶ State Legislators and Other Elected Officials
- ▶ Business Organizations
- ▶ Labor Organizations
- ▶ One-Stop Partners
- ▶ Other Interested Parties

In addition to the announcement, the State Plan was posted to the Indiana Department of Workforce Development's website for 30 days as required by federal guidance. Both a physical address and an e-mail address were provided for feedback. Both addresses provided unique addresses to insure that all public comments were received. In the case of the e-mail address, a unique address (mailbox) was provided to insure that no comment was lost or mixed with other e-mail.

Both physical and electronic mail boxes were checked frequently to insure prompt receipt and timely responses. All input was reviewed with the objective of clarifying and improving the final submitted product. The submitted State Plan includes all public comment changes recommended by the review committee.

Indiana was a little surprised with the low number of public comments since the State Plan modification was widely publicized and the plan was clearly posted on our website.

Indiana's position on the low number of comments–

- ▶ Indiana's original strategic plan was so inclusive that the changes in Modification 3 are not overly significant. They are basically the next steps in a clear path documented in previous modifications of the plan.
- ▶ Indiana spent an extraordinary amount of time in working with elected officials, boards and other interested parties in developing and marketing the strategy. By the time the plan was issued, surprises were at a minimum.

Statistics for and Summary of Comments

Only two public comment notices were received. One was from the Indiana AFL-CIO. The comment addressed four major points. A summary of those points and our responses follows:

- ▶ They opposed Waiver #7 because it took money away from the stated purpose of the Rapid Response fund.
 - Indiana has sufficient funding in the Rapid Response fund to accommodate both the primary purpose of the fund and the alternative use for the funds as outlined in Waiver #7.
 - The use of the funds as match for the Career Advancement Account grant leverages the funds to bring an additional \$3 million dollars to the State over a two year period.
- ▶ They opposed Waiver #8 because it took money away from the population which needs the services.
 - The intent of the modification is to allow the local boards to have sufficient flexibility so that they can truly customize their workforce development system to meet their regional needs.
 - The State will develop policy for the implementation of the waiver that not only adds clarity to the intent, but also provides processes to control the implementation and insure that it retains the objective of increased and improved services for customers.
- ▶ They opposed a number of issues under a general heading of State Merit Staff. The primary one was the integration of service delivery. They were concerned with violations of law and regulation. They also opposed the move of IMPACT to Workforce Development and the planned integration of grievance processes into one policy.
 - This modification of the plan makes no significant changes to Indiana's approach to service integration. No wording in the plan is contrary to law or regulation and Indiana has no intention of violating law or regulation with the implementation.
 - IMPACT transition was in previous versions of the plan. The AFL-CIO did not specify why they opposed it. The transition is covered by a Governor's Executive Order.
 - AFL-CIO opposed an integrated common grievance process for WorkOne employees, but the planned integrated grievance process is for WorkOne clients. Indiana has made minor changes to the State Plan to insure clarity of our intent.
- ▶ They want to insure that all future waivers are subject to public comment and that they have the opportunity to provide input.
 - All new waivers require a plan modification. All modifications require public comment period. Thus, we will automatically comply with their request.

The other public comment notice was from the Indianapolis Private Industry Council, the Workforce Investment Board for Marion County (Indianapolis area). They had objections to Waiver #8 because they thought the State was reducing the amount of formula money that would be distributed to the Workforce Investment Boards. We clarified this in a response letter to them indicating that the waiver only increased the flexibility of the allocated adult and dislocated worker funding that the boards received and that formula money was not being retained by or diverted to the State as a result of this waiver. We further indicated that the Indiana Department of Workforce Development would issue a policy clarifying Waiver #8 and providing processes for its implementation.